

1 **RAMON K. QUICHOCHO, ESQ. (F0243)**
 2 **LAW OFFICES OF RAMON K. QUICHOCHO, LLC**
 3 **2nd Floor, Sign Arts Building, San Jose**
 4 **P.O. Box 505621**
 5 **Saipan, MP 96950**
 6 **Tel. No.: 670.234.8946**
 7 **Fax: 670.234.8920**
 8 **Email: karissa129@gmail.com**

9 *Attorney for Defendant Joaquina V. Santos*

10 **IN THE UNITED STATES DISTRICT COURT**
 11 **FOR THE**
 12 **NORTHERN MARIANA ISLANDS**

13 **UNITED STATES OF AMERICA,**

14 **Plaintiff,**

15 **vs.**

16 **TIMOTHY P. VILLAGOMEZ, ANTHONY C.**
 17 **GUERRERO, JOAQUINA V. SANTOS, AND**
 18 **JAMES A. SANTOS,**

19 **Defendants.**

20 **CRIMINAL CASE NO.: 08-00020**

21 **STIPULATION TO ENLARGE TIME**
 22 **TO FILE PRETRIAL MOTIONS**

23 Plaintiff Unites States of America, by and through Assistant United States Attorney Eric S.
 24 O'Malley and Defendant Joaquina V. Santos, by and through her attorney Ramon K. Quichocho,
 25 hereby stipulate as follows:

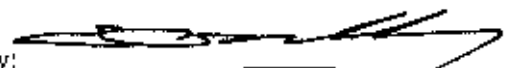
- 26 1. The Court's August 11, 2008 Order Setting Trial Date set August 25, 2008, as the
 27 deadline to file all pretrial motions.
- 28 2. On August 11, 2008, Richard W. Pierce received Discovery Disc 1 from Plaintiff, which
 contains several hundred pages of various documents.
3. On August 19, 2008, Quichocho filed a motion to substitute for Pierce, as counsel of
 record for Defendant Joaquina V. Santos.
4. Quichocho will be off-island for one week during part of September 2008.

1 5. Upon approval of the Court, Defendant Joaquina V. Santos shall have until no later than
2 September 22, 2008, to file any pretrial motions.

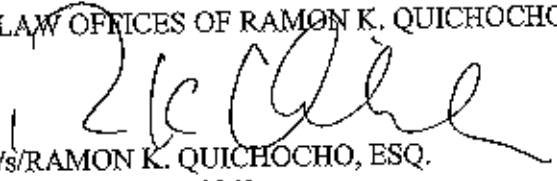
3 WHEREFORE, for the foregoing reasons, the parties to this stipulation respectfully request
4 the Court to issue an order granting the parties' stipulation to extend the time for Defendant Joaquina
5 V. Santos to file any pretrial motions by no later than September 22, 2008.
6

7 SO STIPULATED, this 21 day of August, 2008.

8 LEONARDO M. RAPADAS
9 United States Attorney
10 Districts of Guam and NMI

11 By: 
12 ERIC S. O'MALLEY
13 Assistant United States Attorney

14 LAW OFFICES OF RAMON K. QUICHOCHO, LLC

15 
16 /s/ RAMON K. QUICHOCHO, ESQ.
17 CNMI Bar No. F0243
18 Attorney for Joaquina V. Santos
19
20
21
22
23
24
25
26
27
28